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December 23, 2020

*Amended 2<sup>nd</sup> letter*

**VIA ECF**

Honorable Laura Taylor Swain  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSED

**Re: United States vs. Cristian Costea**  
**19-CR-651 (LTS)**

Dear Judge Swain:

Permit to respectfully thank you for consenting to Mr. Costea's travel request.

It has come to my attention that when I made the request to the Court for Mr. Costea's permission to travel and I stated that Pre-Trial does not oppose given his ongoing compliance with Pre-trial Services, this was incorrect. I have become aware through P.T.S.O. Mohammed Ahmed that it is their office policy to oppose all travel requests for social events and overnight trips for defendants on home detention.

On behalf of my client, Cristian Costea, I respectfully request permission to travel to the Hampton Inn in Lake Placid, New York, with his family from December 25, 2020 through January 2, 2021.

The government through A.U.S.A. Elizabeth Hanft, takes no position on this request.

Counsel is cautioned to be  
certain of the position of the  
party before making a request.  
The permission is granted.  
Def 4 is resolved. SO ORDERED.

Respectfully submitted,

*Jake LaSala*

JAKE LASALA, ESQ.

Cc: A.U.S.A. Robert B. Sobelman (via ECF)  
A.U.S.A. Elizabeth A. Hanft (via ECF)  
A.U.S.A. Daniel Loss (via ECF)  
P.T.S.O (via email)